

HONORABLE BRIAN D. LYNCH

HEARING DATE: WEDNESDAY, DECEMBER 18, 2019
HEARING TIME: 9:00 A.M.
LOCATION: TACOMA, COURTROOM I
RESPONSE DATE: WEDNESDAY, DECEMBER 11, 2019

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re

PUGLIA ENGINEERING, INC.,

Debtor.

No. 18-41324-BDL

FIRST AND FINAL APPLICATION FOR
COMPENSATION BY LARSON GROSS
PLLC AS ACCOUNTANTS

Larson Gross PLLC., Accountants to Puglia Engineering, Inc., debtor in the above-captioned bankruptcy, makes this interim application ("Application") for compensation and reimbursement for services rendered and expenses incurred in this case for the time period of May 18, 2018 through October 31, 2018, as detailed on Exhibit A hereto, respectfully requests this Court enter an Order allowing it fees in the amount of \$24,125.00 and costs in the amount of \$0.00, for a total award of \$24,125.00. In support of this Application, Larson Gross, Inc. represents as follows:

1. Order Authorizing Employment. On July 16, 2018, the Court entered an order authorizing the Debtor to employ Larson Gross, Inc. to provide the Debtor with legal services effective as of May 18, 2018 (Docket No. 312).
2. Amounts Received from Prior Fee Applications. Larson Gross, Inc. has not previously applied for compensation or reimbursement of expenses in the case. Pursuant to the procedures set

FIRST AND FINAL APPLICATION FOR COMPENSATION
BY LARSON GROSS PLLC AS ACCOUNTANTS – Page 1

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1 forth in the Order Establishing Procedures for Interim Payment of Fees and Costs to Professionals
2 (Dkt. No. 345) Larson Gross, Inc. has received 80% of its fees and 100% of its costs for the time
3 period of May 2018 – September 2018 in the total amount of \$7,657.80.

4 3. Amount of Fees and Costs Currently Requested. Larson Gross, Inc. brings this
5 Application for interim approval of the funds received, and award of the remaining unpaid fees and
6 costs of \$16,467.20

7 4. Source of Payment for Requested Compensation. Larson Gross, Inc. seeks
8 compensation from the unencumbered funds of the estate.

9 5. Summary of Services Provided for the Benefit of the Estate. Larson Gross, Inc. was
10 appointed by the Court as accountants to the debtor in July 2018. Larson Gross was engaged to
11 perform the following:

- 12 • 2017 financial statement review of Puglia Engineering, Inc. per agreement letter
13 dated May 23, 2018. As part of the financial statement review, we applied
14 analytical procedures to the Company's financial date, made inquiries of
15 Company management, and began assisting management in preparing the
16 financial statements.
- 17 • 2017 tax return of Puglia Engineering, Inc. per agreement letter dated May 18,
18 2018. As part of the tax return process, we prepared tax return based on
19 information received from the Company and then filed the tax return with the
20 IRS.

21 A complete and detailed account of the services rendered and fees and costs incurred is attached
22 hereto as Exhibit A.

23 6. Tasks remaining and Projection of Future Fees and Expenses.

1 7. The services provided and costs incurred on Exhibit A were performed on behalf of the
2 Debtor and not on behalf of a creditor or other entity herein.

3 8. Pursuant to 11 U.S.C. § 504, Larson Gross, Inc. will not share such compensation or
4 reimbursement of expenses applied for herein with any other person or firm.

5 DATED this 26th day of November, 2019.

6 LARSON GROSS, INC.

7 By /s/ Daniel Obbink
8 Daniel Obbink

9 **DECLARATION**

10 I am a partner at Larson Gross, Inc., and I am one of the professionals responsible for the
11 services rendered the Debtor in the above-captioned bankruptcy. I have personal knowledge of the
12 facts stated herein, and I am competent to testify to them. I make this affidavit in conformance with
13 applicable sections of the Bankruptcy Code and Federal and Local Rules of Bankruptcy Procedure.

14 I declare under penalty of perjury under the laws of the State of Washington that the foregoing
15 is true and correct.

16 DATED this 26th day of November, 2019.

17
18 By /s/ Daniel Obbink
19 Daniel Obbink